

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**PLAINTIFF SINGULAR COMPUTING LLC’S MOTION FOR EXPEDITED BRIEFING
AND TO COMPEL PRODUCTION OF DOCUMENTS**

Plaintiff Singular Computing LLC (“Singular”) hereby moves pursuant to Fed. R. Civ. P. 37(a)(3)(B) to compel Google LLC to produce documents responsive to Plaintiff Singular Computing LLC’s Second Set of Requests for Production Nos. 103, 104, 105, 106, 107, 108, 110, 111, 112, 113, and 115. Singular submits the accompanying Memorandum of Law in Support of its Motion for Expedited Briefing and to Compel Production of Documents. Additionally, in light of the impending deadline for the close of fact discovery (July 23, 2021), Singular respectfully requests that the Court enter an Order for an expedited briefing schedule, with Google’s response to be filed by Tuesday June 29, 2021.

As set forth in Singular’s Memorandum of Law, the discovery that Singular seeks from Google is relevant to material facts at issue in this litigation and Google has no justifiable reason for not providing the documents and information Singular seeks. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Singular respectfully requests that this Honorable Court:

1. Order Google to produce all documents responsive to Plaintiff Singular Computing LLC's Second Set of Requests for Production Nos. 103, 104, 105, 106, 107, 108, 110, 111, 112, 113, and 115, and,
2. Order Google to identify all documents that were previously produced responsive to Plaintiff Singular Computing LLC's Second Set of Requests for Production Nos. 103, 104, 105, 106, 107, 108, 110, 111, 112, 113, and 115

Dated: June 22, 2021

Respectfully submitted,

/s/ Paul Hayes

Paul J. Hayes (BBO #227000)

Matthew D. Vella (BBO #660171)

Kevin Gannon (BBO #640931)

Daniel McGonagle (BBO #690084)

Brian M. Seeve (BBO #670455)

PRINCE LOBEL TYE LLP

One International Place, Suite 3700

Boston, MA 02110

Tel: (617) 456-8000

Fax: (617) 456-8100

Email: phayes@princelobel.com

Email: mvella@princelobel.com

Email: kgannon@princelobel.com

Email: dmcgonagle@princelobel.com

Email: bseeve@princelobel.com

ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Paul Hayes, counsel for Plaintiff, hereby certifies that Plaintiff's counsel met and conferred with counsel for Defendant, Google LLC, in a good-faith attempt to resolve or narrow the issues raised by this motion. Counsel for Defendant refused to produce the requested documents by a date certain leaving an open issue for this Court to resolve. The parties' conference relevant to this motion are detailed in the supporting memorandum.

/s/ Paul Hayes

Paul Hayes

LOCAL RULE 37.1(b) CERTIFICATION

I, Paul Hayes, counsel for Plaintiff, hereby certify that Plaintiff's counsel complied with the provisions of Rule 37.1.

/s/ Paul Hayes

Paul Hayes

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul Hayes